

Erin Lee Truman
Nevada Bar No. 4668
HUTCHISON & STEFFEN, LLC
Peccole Professional Park
10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
(702) 385-2500 phone
(702) 385-2086 facsimile
etruman@hutchlegal.com

*Attorneys for Defendants
M Life, Inc., M'Life Wellness, LLC,
M'Life Nevada, LLC, Daniel Lutz,
and Darvin Gomez*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MGM RESORTS INTERNATIONAL, a
Delaware corporation,

Plaintiff,

v.

M LIFE, INC., a Nevada corporation; M'LIFE
WELLNESS, LLC, a Nevada limited liability
company; M'LIFE NEVADA, LLC, a Nevada
limited liability company; DANIEL LUTZ, an
individual, and DARVIN GOMEZ, an
individual,

Defendants.

Case No.: 2:14-cv-01510-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND THE TIME FOR ALL
DEFENDANTS TO FILE AND SERVE
THEIR JOINT OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

(Seventh Request)

Defendants M Life, Inc., M'Life Wellness, LLC, M'Life Nevada, LLC, Daniel Lutz, and
Darvin Gomez (together, the "Defendants"), on the one hand, and Plaintiff MGM Resorts
International ("Plaintiff" or "MGM"), on the other hand, state the following:

1. The Complaint was filed on September 17, 2014. (Doc. No. 1.)
2. Each of the Defendants was served with the Summons and Complaint or had
accepted service of the Summons and Complaint by October 10, 2014. (Doc. No. 5-7 & 9.)
3. Plaintiff filed a motion for preliminary injunction on October 15, 2014. (Doc.
No. 12.) The Defendants' opposition to the motion was due to be filed and served on November
3, 2014. *See* L.R. 7-2; Fed. R. Civ. P. 6(d).
4. To accommodate settlement discussions, Plaintiff and Defendants entered into

1 successive stipulations to extend that date: (a) from November 3, 2014 to November 17, 2014
 2 (Doc. 17); (b) then from November 17, 2014 to December 8, 2014 (Doc. 20); (c) then from
 3 December 8, 2014 to December 29, 2014 (Doc. 25); (d) then from December 29, 2014 to
 4 January 19, 2015 (Doc. 29); (e) then from January 19, 2015 to February 9, 2015 (Doc. 32); (f)
 5 and then from February 9, 2015 to March 9, 2015 (Doc. 35). The Court granted these requests.
 6 (Docs. Nos. 18, 23, 26, 30, 34 and 38.)

7 5. Settlement discussions have been productive and the parties' counsel believe
 8 that they are close to finalizing a settlement of this case. A proposed settlement agreement has
 9 been drafted. Counsel have proposed edits, revisions and Plaintiff is currently reviewing an
 10 additional counterproposal. However, due to the general press of business and the parties' and
 11 their counsel's schedules, the parties require and respectfully request additional time to finalize
 12 the written settlement agreement.

13 6. Therefore, good cause exists to extend the date for all Defendants to file and
 14 serve their joint opposition to Plaintiff's motion for preliminary injunction from March 9, 2015
 15 to March 20, 2015.

16 **IT IS SO AGREED AND STIPULATED:**

17 HUTCHISON & STEFFEN, LLC

LEWIS ROCA ROTHGERBER LLP

18 BY /s/ Erin Lee Truman
 19 Erin Lee Truman
 20 Peccole Professional Park
 10080 West Alta Drive, Suite 200
 Las Vegas, NV 89145

BY /s/ Jonathan W. Fountain
 Michael J. McCue
 Jonathan W. Fountain
 Meng Zhong
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169-5996

21 *Attorneys for Defendants*
 22 *M'Life, Inc., M'Life Wellness, LLC,*
 23 *M'Life Nevada, LLC, Daniel Lutz,*
and Darvin Gomez

Attorneys for Plaintiff
MGM Resorts International

24 **ORDER**

25 IT IS SO ORDERED. Any future extension request will require a hearing.

26 Dated: March 10, 2015.

27 
 28 UNITED STATES DISTRICT JUDGE